

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RU-EL SAILOR,

Plaintiff,

-vs-

CITY OF CLEVELAND, *et al.*,

Defendants.

Case No. 1:20-cv-00660

Judge David A. Ruiz

**PLAINTIFF’S REPLY IN SUPPORT
OF MOTION TO STAY**

Plaintiff, through counsel, submits this reply in support of his Motion to Stay this case for six months to permit Plaintiff the opportunity to retain new counsel. (Dkt. 82).

Defendants have filed their Opposition (Dkt. 89) to Plaintiff’s Motion to Stay the case (Dkt. 82). The opposition presents arguments related to Defendants’ earlier-filed Motion for Dismissal (Dkt. 88).

On July 26, 2024, Plaintiff filed a Motion to Stay briefing and deadlines associated with Defendants’ Motion for Dismissal (Dkt. 90), asking the Court to delay those deadlines until (a) after the resolution of the Motion to Withdraw (Dkt. 82); (b) after Plaintiff is able to obtain new counsel; and (c) after new counsel are afforded reasonable time to respond to Defendants’ Motion.

Because counsel's Motion to Withdraw (Dkt. 82) and Plaintiff's Motion to Stay Briefing and Deadlines (Dkt. 90) remain pending, and because Defendants' opposition to the Motion to Stay the case for six months is related to their Motion for Dismissal (Dkt. 88), Plaintiff respectfully requests that the Court grant the Motion to Stay the case so that Plaintiff may retain new counsel and to allow new counsel the opportunity to respond to the factual and legal issues raised in Defendants' Motion and Opposition. Should the Court require additional information, Counsel ask that an ex parte status conference be scheduled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Jacqueline Greene
One of the Attorneys for Plaintiff